

## FACT SHEET

as required by LAC 33:IX.3111 for major LPDES facilities, for draft Louisiana Pollutant Discharge Elimination System Permit No. LA0040177; AI 27960; PER20080001 to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

- I. THE APPLICANT IS:** St. Bernard Parish  
Munster and Dravo Wastewater Treatment Plants  
P.O. Box 1278  
Chalmette, Louisiana 70044-1278
- II. PREPARED BY:** Darlene Bernard
- DATE PREPARED:** March 12, 2009
- III. PERMIT ACTION:** reissue LPDES permit LA0040177, AI 27960; PER20080001

LPDES application received: July 23, 2008

The application was not received 180 days prior to the expiration date of the permit, as required by LAC 33:IX.2501.D.1.

EPA has retained enforcement authority.

Previous LPDES permit effective: June 1, 2002

Previous LPDES permit expired: May 31, 2007

**IV. FACILITY INFORMATION:**

- A. The application is for the discharge of treated sanitary wastewater from two publicly owned treatment works with a combined outfall to the Mississippi River, serving the areas of Chalmette and Meraux.
- B. The permit application does not indicate the receipt of industrial wastewater.
- C. The Munster facility is located at 3300 Munster Blvd., in Meraux, St. Bernard Parish.  
The Dravo facility is located at 4200 Jean Lafitte Parkway, in Chalmette, St. Bernard Parish.
- D. The treatment facility consists of:  
Munster – primary clarification, trickling filtration, secondary clarification and a solids contact basin.  
Dravo – two activated sludge treatment plants.

The two effluents are combined for disinfection by chlorination prior to discharge.

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E. Outfall 001 – Sanitary Wastewater - Combined Effluents

Discharge Location: combined effluents, after mixing in the Munster wetwell  
 Latitude 29° 55' 37" North  
 Longitude 89° 56' 6" West

Description: treated sanitary wastewater

Design Capacity: 11 MGD

Note: The design capacity will increase to 14.6 MGD after completion of expansion project for the Munster WWTP to accommodate the consolidation of treatment plants within the parish.

Type of Flow Measurement which the facility is currently using:

Continuous Recorder

NOTE: Based on a decrease in population after Hurricane Katrina, the facility states that the current flow is 3.75 MGD. For purposes of issuing this permit, an interim design capacity of 11 MGD and final design capacity of 14.6 MGD will be used.

V. RECEIVING WATERS:

The discharge is into the Mississippi River in Subsegment 070301 of the Mississippi River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The critical low flow (7Q10) of the Mississippi River is 141,955 cfs.

The hardness value is 152.7 mg/l and the fifteenth percentile value for TSS is 31.4 mg/l.

The designated uses and degree of support for Subsegment 070301 of the Mississippi River Basin are as indicated in the table below<sup>1/</sup>:

Overall Degree of Support for Segment	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Full	Full	Full	Full	N/A	Full	N/A	N/A

<sup>1/</sup> The designated uses and degree of support for Subsegment 070301 of the Mississippi River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

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**VI. ENDANGERED SPECIES:**

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, is listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. Since effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat, LDEQ has determined that the issuance of this LPDES permit is not likely to adversely affect the Pallid sturgeon or its aquatic habitats. As instructed by the FWS in a letter dated November 17, 2008, from Rieck (FWS) to Nolan (LDEQ), this fact sheet has been sent to the FWS for review and consultation.

**VII. HISTORIC SITES:**

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

**VIII. PUBLIC NOTICE:**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Ms. Darlene Bernard  
Permits Division  
Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

**IX. PROPOSED PERMIT LIMITS:**

Subsegment 070301, Mississippi River-from Monte Sano Bayou to Head of Passes, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

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The previous permit contained reporting requirements for Phosphorous and TKN. These reporting requirements were for informational gathering purposes because the receiving waterbody was listed as impaired for phosphorous and nitrogen. However, since the issuance of the previous permit, the receiving waterbody has been designated as fully supporting of its designated uses and therefore is not considered impaired. Therefore, the reporting requirement for both parameters has been removed from the permit.

In addition, the previous permit contained a limit for Mercury. During the issuance of the previous permit, the receiving waterbody was listed as impaired for mercury. However, since the issuance of the previous permit, the receiving waterbody has been designated as fully supporting of its designated uses and therefore is not considered impaired. The application and effluent analysis submitted with the application were reviewed. A water quality screen was run based on the effluent analysis. The water quality screen (See attached Appendix B-2) did not indicate water quality based limits are required for this discharge. The recalculated limit is less stringent than the prior mercury limitation; however, as per LAC33:IX.2707.L.2.a.ii.(a), this is not considered antibacksliding. Therefore, the Mercury limit will be removed from the permit.

**Interim Effluent Limits:**

**OUTFALL 001** – combined Munster and Dravo effluents, after disinfection (design capacity 11 MGD)

Interim limits shall become effective on the effective date of the permit and expire on the completion of the expansion project.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD <sub>5</sub>	2752	30 mg/l	45 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size which discharge into the Mississippi River and previous permit conditions.
TSS	2752	30 mg/l	45 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size which discharge into the Mississippi River and previous permit conditions.

**Other Effluent Limitations:**

## 1) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

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## 2) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

## 3) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.a, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

## 4) Total Residual Chlorine

The previous permit had a Total Residual Chlorine (TRC) limit of 2.2 mg/l monthly avg., and 5.3 mg/l weekly avg. The water quality screen did not indicate a need for a TRC limit. EPA's antibacksliding policy does not allow a permit to be renewed, reissued, or modified to contain effluent limitations which are less stringent than required in the previous permit. Since the effluent limitations in the previous permit are more stringent than the water quality based limits in the screen performed (Appendix B-1), the limits will remain the same as the previous permit.

## Final Effluent Limits:

**OUTFALL 001** – treated sanitary wastewater (design capacity 14.6 MGD)

Design Capacity will increase to 14.6 after expansion of the Munster WWTP to accommodate the consolidation of treatment plants within the parish:

Final limits shall become effective upon completion of expansion project and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD <sub>5</sub>	3653	30 mg/l	45 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size which discharge into the Mississippi River and previous permit conditions.

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Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
TSS	3653	30 mg/l	45 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size which discharge into the Mississippi River and previous permit conditions.

## 1) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

## 2) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

## 3) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.a, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

## 4) Total Residual Chlorine

The previous permit had a Total Residual Chlorine (TRC) limit of 2.2 mg/l monthly avg., and 5.3 mg/l weekly avg. The water quality screen did not indicate a need for a TRC limit. EPA's antibacksliding policy does not allow a permit to be renewed, reissued, or modified to contain effluent limitations which are less stringent than required in the previous permit. Since the effluent limitations in the previous permit are more stringent than the water quality based limits in the screen performed (Appendix B-1), the limits will remain the same as the previous permit.

## Toxicity Characteristics

In accordance with EPA's Region 6 Post-Third Round Toxics Strategy, permits issued to treatment works treating domestic wastewater with a flow (design or expected) greater than or equal to 1 MGD shall require biomonitoring at some frequency for the life of the permit or where available data show reasonable potential to cause lethality, the permit shall require a whole effluent toxicity (WET) limit (*Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards*, April 16, 2008 VERSION 6).

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Whole effluent biomonitoring is the most direct measure of potential toxicity which incorporates the effects of synergism of the effluent components and receiving stream water quality characteristics. Biomonitoring of the effluent is, therefore, required as a condition of this permit to assess potential toxicity. LAC 33:IX.1121.B.3. provides for the use of biomonitoring to monitor the effluent for protection of State waters. The biomonitoring procedures stipulated as a condition of this permit are as follows:

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No. LA0040177, **Biomonitoring Section** for the organisms indicated below.

Chronic toxicity tests are generally required of those discharges with potential toxicity using critical dilutions as determined by an applicable dilution model. However, equivalent acute toxicity testing is allowed, and is being proposed in this permit, in lieu of chronic toxicity testing for discharges that have a critical dilution of 5% or less.

TOXICITY TESTSFREQUENCY

48 Hour Definitive Toxicity Test  
using Daphnia pulex

1/Year

48 Hour Definitive Toxicity Test  
using fathead minnow (Pimephales promelas)

1/Year

Dilution Series - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 0.20%, 0.27%, 0.36%, 0.48%, and 0.64%. The biomonitoring critical dilution is defined as 0.48% effluent. The critical dilution is calculated in Appendix B-1 of this fact sheet. According to the Implementation of State Standards, acute toxicity testing in addition to, or in lieu of, chronic toxicity testing may be imposed for discharges that have a critical dilution of five percent (5%) or less. An acute to chronic ratio has been applied in the calculations. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the **Biomonitoring Section** under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the **Biomonitoring Section** of the permit.

The permit may be reopened to require effluent limits, additional testing, and/or other appropriate actions to address toxicity if biomonitoring data show actual or potential ambient toxicity to be the result of the permittee's discharge to the receiving stream or water body. Modification or revocation of the permit is subject to the provisions of LAC 33:IX.2383. Accelerated or intensified toxicity testing may be required in accordance with Section 308 of the Clean Water Act.

**Toxic Substances**

Due to drinking water supply being a designated use, the permittee shall analyze the final effluent for the presence of the following toxic substances. The MQL is intended as action levels. Should a toxic substance exceed the MQL, the permittee shall determine the source of the substance and take whatever measures necessary to secure abatement in order to protect all drinking water sources downstream of the discharge. Records of any actions taken shall be made available upon request by any duly authorized regional inspectors and/or LDEQ Headquarter representatives.

A report containing the results of the lab analysis indicating if any toxic substances have exceeded the MQL including a brief summary of any abatement taken at the time, must be submitted to this Office within

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20 days of completion of the analysis. The first analysis shall be performed within one year following the effective date of the permit, and annually thereafter, by a 24-hour composite sample type.

Reports must be submitted to the following address:

Department of Environmental Quality  
Office of Environmental Compliance  
**Enforcement Division**  
Post Office Box 4312  
Baton Rouge, Louisiana 70821-4312

In addition, enforcement authority has been retained by EPA. Therefore, the report must also be submitted to the following address until notification that enforcement authority has been assumed by LDEQ:

U.S. Environmental Protection Agency, Region 6  
Water Enforcement Branch, 6 EN-WC  
1445 Ross Avenue  
Dallas, Texas 75202

#### TOXIC SUBSTANCES

TOXIC SUBSTANCES (CAS NO.)	Required MQL (µg/l)
<b>VOLATILE ORGANIC CHEMICALS</b>	
Acrolein (107-02-8)	50
acrylonitrile (107-13-1)	50
benzene (71-43-2)	10
bromodichloromethane (dichlorobromomethane) (75-27-4)	10
bromoform (tribromomethane) (75-25-2)	10
carbon tetrachloride (56-23-5)	10
chlorobenzene (108-90-7)	10
chloroform (trichloromethane)	10
chloromethane (methyl chloride) (74-87-3)	50
1,1-dichloroethane (75-34-3)	10
1,2-dichloroethane (107-06-2)	10
1,1-dichloroethylene (75-35-4)	10
dichloromethane (methylene chloride) (75-09-2)	20
cis-1,3-dichloropropene	10
trans-1,3-dichloropropene	10
ethylbenzene (100-41-4)	10
para-dichlorobenzene	---
1,1,2,2-tetrachloroethane (79-34-5)	10



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tetrachloroethylene (127-18-4)	10
toluene (108-88-3)	10
1,1,1-trichloroethane (71-55-6)	10
1,1,2-trichloroethane (79-00-5)	10
trichloroethylene (79-01-6)	10
vinyl chloride (chloroethylene) (75-01-4)	10
<b>ACID EXTRACTABLE ORGANIC CHEMICALS</b>	
2-chlorophenol (95-57-8)	10
3-chlorophenol	10
4-chlorophenol	10
2,4-dichlorophenol (120-83-2)	10
2,3-dichlorophenol	10
2,5-dichlorophenol	10
2,6-dichlorophenol	10
3,4-dichlorophenol	10
2,4-dinitrophenol (51-28-5)	50
pentachlorophenol (87-86-5)	50
phenol (108-95-2)	10
2,4,6-trichlorophenol (88-06-2)	10
<b>BASE/NEUTRAL EXTRACTABLE ORGANIC CHEMICALS</b>	
anthracene (120-12-7)	10
benzidine (92-87-5)	50
bis(2-chloroethyl)ether (111-44-4)	10
bis(2-chloro-1-methylethyl)ether (39638-32-9)	10
bis(2-ethylhexyl)phthalate (117-81-7)	10
di-n-butyl phthalate (84-74-3)	10
1,3-dichlorobenzene (541-73-1)	10
1,2-dichlorobenzene (95-50-1)	10
1,4-dichlorobenzene (106-46-7)	10
3,3-dichlorobenzidine (91-94-1)	50
diethyl phthalate (84-66-2)	10
dimethyl phthalate (131-11-3)	10
2,4-dinitrotoluene (121-14-2)	10
1,2-diphenylhydrazine (122-66-7)	20
fluoranthene (206-44-0)	10
hexachlorobenzene (118-07-1)	10
hexachlorobutadiene (87-68-3)	10
hexachlorocyclopentadiene (77-47-4)	10
hexachloroethane (67-72-1)	20
isophorone (78-59-1)	10

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nitrobenzene (98-95-3)	10
N-nitrosodimethylamine (62-75-9)	50
N-nitrosodiphenylamine (86-30-6)	20
<b>PESTICIDES &amp; PCBs</b>	
aldrin (309-00-2)	0.05
PCB's (Total)	1.0
gamma-BHC (Lindane, Hexachlorocyclohexane) (58-89-9)	0.05
chlordane (57-74-9)	0.2
4,4"DDD (TDE) (72-54-8)	0.1
4,4"DDE (72-55-9)	0.1
4,4"DDT (50-29-3)	0.1
Dieldrin (60-57-1)	0.1
endosulfan I (alpha) (115-29-7)	0.1
endosulfan II (beta) (115-29-7)	0.1
endrin (72-20-8)	0.1
heptachlor (76-44-8)	0.05
Methoxychlor	---
2,3,7,8-tetrachlorodibenzo-p-dioxin (1764-01-6)	---
toxaphene (8001-35-2)	5.0
2,4-dichlorophenoxyacetic acid (2,4-D) (94-75-7)	10
2-(2,4,5-trichlorophenoxy)propionic acid	4
<b>METALS</b>	
antimony (7440-36-0)	60
arsenic (7440-38-2)	10
Barium	---
beryllium (7440-41-7)	5
cadmium (7440-43-9)	1
chromium III (16065-83-1)	10
chromium VI (7440-47-3)	10
copper (7550-50-8)	10
lead (7439-92-1)	5
Flouride	---
mercury (7439-97-6)	0.2
nickel (7440-02-0)	40

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nitrate (as N)	---
selenium (7782-49-2)	5
silver (7440-22-4)	2
thallium (7440-28-0)	10
zinc (7440-66-6)	20
<b>MISCELLANEOUS</b>	
Cyanide	20
total phenols	5

## X.

**PREVIOUS PERMITS:**

LPDES Permit No. LA0040177: Effective: June 1, 2002

Expired: May 31, 2007

Internal Outfall 101 – treated sanitary wastewater prior to disinfection (design capacity 7.5 MGD)

<u>Effluent</u> <u>Characteristic</u>	<u>Discharge Limitations</u>			<u>Monitoring Requirements</u>	
	<u>Monthly</u> <u>Avg.</u>	<u>Monthly</u> <u>Avg.</u>	<u>Weekly</u> <u>Avg.</u>	<u>Measurement</u> <u>Frequency</u>	<u>Sample</u> <u>Type</u>
Flow	---	Report	Report	Continuous	Recorder
BOD <sub>5</sub>	1877 lbs/day	30 mg/l	45 mg/l	1/day	Calculate
TSS	1877 lbs/day	30 mg/l	45 mg/l	1/day	Calculate

Internal Outfall 201 – treated sanitary wastewater prior to disinfection (design capacity is 3.5 MGD)

<u>Effluent</u> <u>Characteristic</u>	<u>Discharge Limitations</u>			<u>Monitoring Requirements</u>	
	<u>Monthly</u> <u>Avg.</u>	<u>Monthly</u> <u>Avg.</u>	<u>Weekly</u> <u>Avg.</u>	<u>Measurement</u> <u>Frequency</u>	<u>Sample</u> <u>Type</u>
Flow	---	Report	Report	Continuous	Recorder
BOD <sub>5</sub>	876 lbs/day	30 mg/l	45 mg/l	1/day	12 Hr. Comp.
TSS	876 lbs/day	30 mg/l	45 mg/l	1/day	12 Hr. Comp.

Internal Outfall 301 – combined treated sanitary wastewater prior to disinfection (design capacity 11 MGD)

<u>Effluent</u> <u>Characteristic</u>	<u>Discharge Limitations</u>			<u>Monitoring Requirements</u>	
	<u>Monthly</u> <u>Avg.</u>	<u>Monthly</u> <u>Avg.</u>	<u>Weekly</u> <u>Avg.</u>	<u>Measurement</u> <u>Frequency</u>	<u>Sample</u> <u>Type</u>
Flow	---	Report	Report	Continuous	Recorder
BOD <sub>5</sub>	2752 lbs/day	30 mg/l	45 mg/l	1/day	12 Hr. Comp.
TSS	2752 lbs/day	30 mg/l	45 mg/l	1/day	12 Hr. Comp.
pH	Range (6.0 su – 9.0 su)			1/day	Grab
Toxic Substances	---	---	---	1/year	24 Hr Comp
Mercury	0.18	---	---	1/quarter	24 Hr Comp
Total Phosphorus	Report (lbs/day)	Report (mg/l)	Report (mg/l)	1/quarter	Grab

<u>Effluent</u> <u>Characteristic</u>	<u>Discharge Limitations</u>			<u>Monitoring Requirements</u>	
	<u>Monthly</u> <u>Avg.</u>	<u>Monthly</u> <u>Avg.</u>	<u>Weekly</u> <u>Avg.</u>	<u>Measurement</u> <u>Frequency</u>	<u>Sample</u> <u>Type</u>

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Kjeldahl Nitrogen (Total as N)	Report (lbs/day)	Report (mg/l)	Report (mg/l)	1/quarter	Grab
Biomonitoring					
<i>Pimephales promelas</i>	---	Report	Report	1/year	24 Hr Comp
<i>Daphnia pulex</i>	---	Report	Report	1/year	24 Hr Comp

The permit contains biomonitoring.

The permit contains pollution prevention language.

The permit contains pretreatment option 1 language.

Outfall 001 – treated sanitary wastewater

<u>Effluent</u> <u>Characteristic</u>	<u>Discharge Limitations</u>			<u>Monitoring Requirements</u>	
	<u>Monthly</u>	<u>Monthly</u>	<u>Weekly</u>	<u>Measurement</u>	<u>Sample</u>
	<u>Avg.</u>	<u>Avg.</u>	<u>Avg.</u>	<u>Frequency</u>	<u>Type</u>
Fecal Coliform					
Colonies/100 ml	---	200	400	1/day	Grab
TRC	---	2.2 mg/l	5.3mg/l	1/day	Grab

## XI.

ENFORCEMENT AND SURVEILLANCE ACTIONS:

## A) Inspections

A review of the files indicates the following most recent inspections performed for this facility.

Date – September 20, 2005

Inspector - LDEQ

Findings and/or Violations –

Hurricane Assessment Inspection revealed that the facility was not operating. No power at time of inspection. Facility not flooded at time of inspection, but had been underwater. Extent of damage could not be determined.

Date – February 28, 2007

Inspector – LDEQ

Findings and/or Violations –

A Compliance evaluation inspection was conducted to verify if the facility is meeting the requirements of LDEQ Regulations. The plant is believed to have begun discharging in December, 2006, after having been disabled by Hurricane Katrina in August, 2005. Facility is currently operating as an activated sludge plant using chlorine gas for disinfection prior to discharging. A belt press is used to process wasted sludge prior to disposal. No samples or flow measurements have been taken since the plant began operating again. No DMRs have been submitted to LDEQ since July, 2005.

Date – December 28, 2007

Inspector – LDEQ

Findings and/or Violations –

A Compliance Inspection was performed and revealed that the permit authorized St.

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Bernard Parish to discharge treated sanitary wastewater from two publicly owned treatment works with a combined outfall to the Mississippi River. The two effluents are combined for disinfection by chlorination prior to discharge. The LPDES permit LA0040177 expired on May 31, 2007. A permit renewal application was not submitted at least 180 days prior to the expiration date of the permit, nor prior to the expiration date of the permit. The Munster and Dravo Wastewater Treatment Facilities are currently operating without a permit. Both treatment facilities were visited at the time of inspection, and revealed that both facilities have not been restored to pre-Hurricane Katrina condition. Records reviewed since the date of the last inspection revealed that DMRs were submitted beginning May, 2007.

Date – September 5, 2008

Inspector – LDEQ

Findings and/or Violations –

Hurricane Assessment – Made phone call to assess damage from Hurricane Gustav. No one answered phone. No inspection done at this time.

Date – September 6, 2008

Inspector – LDEQ

Findings and/or Violations –

Hurricane Assessment – Made phone call to assess damage from Hurricane Gustav. No one answered phone. No inspection done at this time.

Date – September 8, 2008

Inspector – LDEQ

Findings and/or Violations –

Hurricane Assessment – Made phone call to assess damage from Hurricane Gustav. No one answered phone, left message. No inspection done at this time.

Date – September 9, 2008

Inspector – LDEQ

Findings and/or Violations –

Hurricane Assessment – Facility lost power and was on grid, with temporary pumps. No bypassing. Plant grounds are overgrown with weed, trees, and brush. About a month ago there was a discharge from the vac truck dump site into the wetlands next to the plant grounds. Discharge line to headworks from dump site is clogged with solids. There are significant air leaks in lines leading to blowers. Belt press is down. Effluent is green and turbid, with paper debris. Final Clarifier overflows when it rains at the Dravo plant. Munster has no alarms and is often unstaffed on weekends.

**B) Compliance and/or Administrative Orders**

A review of the files indicates that enforcement actions have been administered against this facility as follows:

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September 10, 2008 --

Administrative Order Docket No. CWA-06-2008-2057 – AO was issued for failure to submit annual sludge discharge monitoring reports for calendar years 2006 and/or 2007.

NOTE: There was an Administrative Order Docket No. CWA-06-2005-1863. There is no record of this order in EDMS.

C) **DMR Review**

A review of EDMS revealed the following Discharge Monitoring Reports:

Date	Outfall	Parameter	Monthly Average (mg/l)	Weekly Average (mg/l)	Monthly Average (lbs/day)
05-07	001	Fecal Coliform		7,694 col/100 ml	
07-07	001	Fecal Coliform		8,124 col/100 ml	
08-07	001	Fecal Coliform		28,604 col/100 ml	
09-07	001	Fecal Coliform	572 col/100 ml	10,408 col/100 ml	
Date	Outfall	Parameter	Monthly Average (mg/l)	Weekly Average (mg/l)	Monthly Average (lbs/day)
10-07	001	Fecal Coliform	758 col/100 ml	33,166 col/100 ml	
01-08	301	BOD <sub>5</sub>		56 mg/l	
		TSS	46 mg/l	173 mg/l	
	001			60,000 col/100 ml	
03-08	001	Fecal Coliform		548 col/100 ml	
04-08	301	BOD <sub>5</sub>		65 mg/l	
		TSS		78 mg/l	
05-08	301	BOD <sub>5</sub>		65 mg/l	
		TSS		78 mg/l	
06-08	001	Fecal Coliform	778 col/100 ml	9,033 col/100 ml	
	301	TSS		64 mg/l	
07-08	001	Fecal Coliform		775 col/100 ml	
	301	BOD <sub>5</sub>		83 mg/l	
08-08	301	TSS		88 mg/l	2,813 lbs/day

NOTE: There were no DMRs on file from July, 2005 to April, 2007.

## XII.

**ADDITIONAL INFORMATION:**

LDEQ reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future. Additional limitations and/or restrictions are based upon water quality studies and can indicate the need for advanced wastewater treatment. Water quality studies of similar dischargers and receiving water bodies have resulted in monthly average effluent limitations of 5mg/L CBOD<sub>5</sub> and 2 mg/L NH<sub>3</sub>-N. Prior to upgrading or expanding this facility, the permittee should contact LDEQ to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

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The nearest drinking water intake, Pointe-a-la-Hache Waterworks and Port Sulphur Waterworks are located approximately 38 river miles downstream from the discharge point(s).

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 14.6 MGD (after completion of expansion project).

Effluent loadings are calculated using the following example:

$$\text{BOD}_5: 8.34 \text{ gal/lb} \times 14.6 \text{ MGD} \times 30 \text{ mg/l} = 3653 \text{ lbs/day}$$

The Monitoring Requirements, Sample Types, and Frequency of Sampling for the facility are described below:

**Outfall 001 – combined Munster & Dravo effluents after disinfection**

Effluent Characteristics

Flow  
BOD<sub>5</sub>  
Total Suspended Solids

Effluent Characteristics

pH  
Fecal Coliform Bacteria  
TRC  
Biomonitoring Daphnia pulex  
Pimephales promelas  
Toxic Substances

Monitoring Requirements

<u>Measurement</u>	<u>Sample</u>
<u>Frequency</u>	<u>Type</u>
Continuous	Recorder
3/week	12 Hr. Composite
3/week	12 Hr. Composite

Monitoring Requirements

<u>Measurement</u>	<u>Sample</u>
<u>Frequency</u>	<u>Type</u>
3/week	Grab
3/week	Grab
3/week	Grab
1/year <sup>1</sup>	24 Hr. Composite
1/year <sup>1</sup>	24 Hr. Composite
1/year	24 Hr. Composite

**NOTE:** The facility requested an interim reduction in measurement frequency from 1/day to 2/week based on reduced flows until completion of expansion project. It is proposed that this permit be issued with a measurement frequency of 3/week until completion of the expansion project. Upon completion of the expansion project, the measurement frequency will return to 1/day.

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, LDEQ Option 1 Pretreatment Language is required for this facility.

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

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The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

### Stormwater Discharges

Because the design flow of the Munster and Dravo Wastewater Treatment Plant is equal to or greater than 1.0 MGD and in accordance with LAC 33:IX.2511.B.14.i, the facility may contain storm water discharges associated with industrial activity. Therefore, in accordance with LAC 33:IX.2511.A.1.b, specific requirements addressing stormwater discharges will be included in the discharge permit.

## XIII

### TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

## XIV

### REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, St. Bernard Parish, Munster and Dravo Wastewater Treatment Facilities, July 23, 2008.